

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

Kayla Williams,	:	
	:	
Plaintiff,	:	Case No. 4:20-cv-00298-MWB
	:	
v.	:	Judge Matthew W. Brann
	:	
The Pennsylvania State University,	:	
et al.,	:	
	:	Electronically Filed
Defendants	:	
	:	

ORDER

AND NOW, this _____ day of March, 2020, upon consideration of Defendant The Pennsylvania State University's Unopposed Motion for Enlargement of Time, the Motion is **GRANTED**, and it is **HEREBY ORDERED** **THAT** the University shall have until **Monday, March 23, 2020** to respond to Plaintiff Kayla Williams' Complaint. For clarity, all Defendants will have the same response deadline of March 23, 2020. Further, consistent with the Local Rule, within 14 days after March 23rd, Defendants shall file a brief in support of any responsive motion.

BY THE COURT

The Honorable Matthew W. Brann
United States District Judge

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et al.,	:	
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Defendants	:	
	:	

**DEFENDANT THE PENNSYLVANIA STATE UNIVERSITY’S
UNOPPOSED MOTION FOR ENLARGEMENT OF TIME**

Defendant The Pennsylvania State University (the “University”), by and through its undersigned counsel, hereby moves for an enlargement of time within which to answer or otherwise respond to the Complaint of Plaintiff Kayla Williams (Doc. No. 1), and in support thereof states:

1. Plaintiff Kayla Williams commenced this action by filing her Complaint on February 19, 2020 (*see* Docket No. 1);
2. Plaintiff Kayla Williams effectuated service on the University on February 20, 2020 (*see* Docket No. 3);
3. The University’s response to the Complaint is currently due March 12, 2020;

4. On March 2, 2020, undersigned counsel notified Plaintiff's counsel that in addition to the University, undersigned counsel also represents the individual defendants named in this matter – Defendants Feldbaum, Prawdzik, and Yarwood (collectively the “Individual Defendants”);

5. That same day, undersigned counsel agreed to accept service of the Complaint by email on behalf of the Individual Defendants; making the Individual Defendants' response to Plaintiff Kayla Williams' Complaint due March 23, 2020;

6. That same day, undersigned counsel inquired whether Plaintiff's counsel would consent to a uniform response deadline for all Defendants, thus giving the University additional time to respond to Plaintiff Kayla Williams' Complaint;

7. Plaintiff's counsel consented to undersigned counsel's request that Defendants' response deadline would be standardized and set as March 23, 2020; and

8. No prior extensions have been sought by any parties to this action.

WHEREFORE, Defendant The Pennsylvania State University respectfully requests that the Court enlarge the University's deadline to answer or otherwise respond to the Complaint to March 23, 2020 in order to standardize the response deadline for all Defendants.

Respectfully submitted,

Dated: March 6, 2020

s/ James A. Keller

James A. Keller (PA78955)

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*Attorney for Defendants The Pennsylvania
State University, Karen Feldbaum, Brendan
Prawdzik, and Michelle Yarwood*

CERTIFICATE OF CONCURRENCE

I hereby certify that before filing the forgoing Motion, I sought concurrence from Plaintiff's counsel, who confirmed that Plaintiff's counsel has no objection to the foregoing extension request to standardize the response deadline.

s/ James A. Keller
James A. Keller, Esq.

Dated: March 6, 2020

CERTIFICATE OF SERVICE

I hereby certify that on March 6, 2020, I served a true and correct copy of the foregoing *Unopposed Motion for Enlargement of Time* upon all counsel of record via the Court's CM/ECF system.

s/ James A. Keller
James A. Keller, Esq.

Dated: March 6, 2020